

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

DEFENDANT'S ASSENTED-TO MOTION FOR IMPOUNDMENT

Defendant Voice Signal Technologies, Inc. moves pursuant to Local Rule 7.2 and section 14 of the parties' agreed-to Protective Order for an order impounding its Memorandum in Opposition to ScanSoft's Emergency Motion to Show Cause Why Defendant Should Not Be Held in Contempt and Request for Determination of Subject Matter Waiver (the "Opposition"). A partially redacted copy of the Opposition is being filed concurrently electronically; an unredacted copy of the Opposition is being filed concurrently by mail.

As grounds for this motion, Voice Signal states that page 11 of its Opposition quotes from e-mails produced by ScanSoft in this litigation which ScanSoft has designated as highly confidential pursuant to the parties' Protective Order. Pursuant to section 14 of the parties' Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose highly confidential information, as defined by the Protective Order, must be filed under seal.

While Voice Signal does not believe that the e-mails quoted in the Opposition contain confidential information, ScanSoft has insisted that they be filed under seal and that the Opposition be redacted to the extent it quotes from them.

WHEREFORE, Voice Signal requests that the Court enter an order impounding its Opposition. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file its Opposition under seal concurrently with this motion for impoundment.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Paul E. Bonanno

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Dated: June 22, 2005

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on June 22, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Paul E. Bonanno

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